

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL MASTER, LTD.;	:	
ACP MASTER, LTD.; AURELIUS	:	
OPPORTUNITIES FUND, LLC; 683	:	
CAPITAL PARTNERS, LP; ADONA LLC;	:	
EGOZ I LLC; EGOZ II LLC; MASTERGEN,	:	
LLC; ERYTHRINA, LLC; AP 2016 1, LLC;	:	
AP 2014 3A, LLC; AP 2014 2, LLC; WASO	:	
HOLDING CORPORATION; TWO SEAS	:	
GLOBAL (MASTER) FUND LP; VIRTUAL	:	
EMERALD INTERNATIONAL LTD.; and	:	
THE BANK OF NEW YORK MELLON,	:	Case No.: 1:23-CV-10838 (LAP)
solely in its capacity as Trustee,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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STIPULATION AND ORDER

Defendant The Republic of Argentina (the “Republic”), through its counsel, and Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund, LLC, 683 Capital Partners, LP, Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC, Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC, WASO Holding Corporation, Two Seas Global (Master) Fund LP, Virtual Emerald International Ltd., and The Bank of New York Mellon, solely in its capacity as Trustee (together, “Plaintiffs”), through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, between January 2019 and December 2020, certain plaintiffs, including twelve of the Plaintiffs in this action, filed suit against the Republic alleging that payment

was due under U.S. dollar-denominated GDP-linked securities (the “Securities”) for reference year 2013 (the “RY 2013 Actions”)¹;

WHEREAS, on October 2, 2023, briefing was fully submitted in the RY 2013 Actions on cross-motions for summary judgment;

WHEREAS, on December 13, 2023, Plaintiffs filed their complaint in this action (ECF No. 1, the “Complaint”), alleging that payment was due under the Securities for reference years following 2013;

WHEREAS, on January 23, 2024, the Republic and Plaintiffs filed a Stipulation and Proposed Order extending the Republic’s time to answer, move to dismiss, or otherwise respond to the Complaint to 60 days after the Court rules on the cross-motions for summary judgment in the RY 2013 Actions (ECF No. 18);

WHEREAS, on January 24, 2024, the Court so ordered the January 23, 2024 Stipulation and Order (ECF No. 19);

WHEREAS, on March 31, 2024, the Court issued an Opinion and Order resolving the cross-motions for summary judgment in the RY 2013 Actions, which was entered on the docket on April 1, 2024; and

WHEREAS, the Republic’s response to the Complaint is currently due on May 31, 2024.

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN the undersigned counsel as follows:

¹ There are six RY 2013 Actions in total: *Aurelius Capital Master, Ltd. v. The Republic of Argentina*, 19-cv-0351-LAP; *ACP Master, Ltd. v. The Republic of Argentina*, 19-cv-10109-LAP; *Novoriver S.A. v. The Argentine Republic*, 19-cv-09786-LAP; *683 Capital Partners, LP v. The Republic of Argentina*, 19-cv-10131-LAP; *Adona LLC, et. al. v. The Republic of Argentina*, 19-cv-11338; and *Ape Group SPA, et. al. v. The Republic of Argentina*, 20-cv-10409.

1. The Republic's time to answer, move to dismiss, or otherwise respond to the Complaint is extended to July 2, 2024.

2. The Republic does not waive and expressly retains all defenses and objections to the Complaint, except for defenses and objections based on a defect in service of process in this action. The defenses and objections that the Republic retains include but are not limited to defenses and objections related to (i) any applicable statutes of limitation or prescription periods and (ii) any other challenge to the legal sufficiency of Plaintiffs' claims.

Dated: May 24, 2024

/s/ Robert J. Giuffra, Jr.

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/s/ Matthew M. Riccardi

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Counsel for Plaintiff 683 Capital Partners, LP

IT IS SO ORDERED, this 24th day of May, 2024:



Hon. Loretta A. Preska

United States District Judge